1 STEVEN T. JAFFE, ESQ. Nevada Bar No. 7035 2 sjaffe@halljaffe.com 3 HALL JAFFE, LLP 7425 Peak Drive 4 Las Vegas, Nevada 89128 (702) 316-4111 5 Fax (702) 316-4114 6 Attorneys for Plaintiff 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 9 JOHN W. BAKO, an individual, CASE NO. 2:25-cv-01030-CDS-MDC STIPULATION AND ORDER Plaintiff 10 EXTENDING DEADLINE FOR PLAINTIFF'S OPPOSITION TO v. 11 **DEFENDANTS' MOTION TO DISMISS** PLAINTIFF'S COMPLAINT 12 CLARK COUNTY SCHOOL DISTRICT, a Nevada Public Governmental Entity: BRUCE CLARK, an individual; DOES Individuals I 13 through XX, inclusive; and ROE Corporations 14 and Business Entities I through XX, inclusive, 15 Defendants 16 COMES NOW Plaintiff, JOHN W. BAKO, by and through his attorneys of record 17 STEVEN T. JAFFE, ESQ. of HALL JAFFE, LLP, and Defendants, CLARK COUNTY 18 SCHOOL DISTRICT and BRUCE CLARK, by and through their counsel of record, 19 CRYSTAL J. PUGH, ESQ., and BETTY J. FOLEY, ESQ., of CLARK COUNTY SCHOOL 20 DISTRICT OFFICE OF THE GENERAL COUNSEL, and hereby respectfully submit this 21 Stipulation and Order, as follows: 22 IT IS HEREBY STIPULATED AND AGREED by and between the undersigned 23 counsel that any opposition or response to Defendants' Motion to Dismiss Plaintiff's 24 Complaint [ECF No. 6] shall be due on August 1, 2025; 25 IT IS FURTHER STIPULATED AND AGREED by and between the undersigned 26 counsel that any reply brief shall be due on August 8, 2025. 27

28

27

28

This request for an extension is sought because counsel for Plaintiff is starting a twoweek trial in case number A-20-826741-C, in Department 27, the Eighth Judicial District Court, Department 27, Judge Mendoza, on Monday, July 7, 2025. Trial preparation has been all consuming for counsel and he has been unable to complete Plaintiff's opposing brief.

The parties stipulate that this circumstance constitutes good cause for the relief sought.

HALL JAFFE, LLP

CLARK COUNTY SCHOOL DISTRICT

By: /s/ Steven T. Jaffe STEVEN T. JAFFE, ESQ. Nevada Bar No. 7035 7425 Peak Drive Las Vegas, Nevada 89128 Attorney for Plaintiff

By: /s/ Betty J. Foley CRYSTAL J. PUGH, ESO. Nevada Bar No. 12396 BETTY J. FOLEY, ESQ. Nevada Bar No. 14517 5100 W. Sahara Avenue Las Vegas, NV 89146 Attorneys for Defendants

## **ORDER**

IT IS SO ORDERED.

Cristina D. Silva

United States District Judge

Dated: July 7, 2025